

### REMARKS

This is in response to the Office Action of August 4, 2008. With this response, claim 13 is amended and all pending claims 1-20 are presented for reconsideration and favorable action.

In the Office Action, the Examiner refers to Huber (US 4,582,597), Janssens (US 5,226,546), and Hukki (US 2003/0057140). Although the Examiner initially suggests claims 1, 2 and 14 to 20 to be rejected based on a combination of Huber and Janssens, it appears from the arguments that he is actually referring to a combination of Huber and Hukki.

The Examiner admits that Huber lacks at least “one or more clamping members”, as defined by claim 1. It is worth noting that the clamping members of claim 1 provide a required second bearing surface or surface when in the deployed position. When in the non-deployed position, the screen frame can be lifted away from the first bearing surface for removal from the chassis.

In contrast, the arrangement shown in Huber relies on inflation of the pneumatic tube 42 to lift the screen frame 46 slightly. This clamps the screen frame firmly between the restraining member 44 and the channel 40, both of which are fixed in position. It is not possible when operating the device of Huber to lift the screen frame away in the transverse clamping direction away from the first bearing surface, for removal from the chassis. In Huber, the screen frame 46 can be removed from the chassis only when the pneumatic tube 42 is not inflated. In that case, the screen frame is removed by sliding the plane of the screen 48. This is quite different from the action of lifting the screen frame away in the transverse (clamping) direction.

The Examiner suggests that Hukki shows “at least one expandable element mountable in the chassis and expandable in a direction transverse to said bearing surfaces to effect such clamping of the screen frame”. Reference is made to diaphragm 68, particularly shown in Figure 5 of Hukki. However, it is clear from Hukki in paragraph [0026] in combination with Figure 5, that the diaphragm is not expandable in a direction transverse to the bearing surfaces to effect the clamping of the screen frame.

Rather, the device shown in Hukki operates in a different fashion. Actuators 60

include a thick base 64, which interlocks with an elastomeric retainer 62. The base 64 and diaphragm 68 cooperate to define an inflatable body, which when inflated, pushes against lower lever 54 of clip 48. This moves the clip into a position that holds the screen frame 24 in place. Hence, Hukki does not disclose an expandable element that is expandable in a direction transverse to the bearing surface to effect clamping of the screen frame.

The diaphragm 68 shown in Hukki expands in a direction parallel to the bearing surface to act on the hook 56, but not directly to provide an effective force against the bearing surfaces that would itself hold the screen frame in position. Moreover, since inflation of the diaphragm 68 causes the hook 56 to lock the screen frame in place, deflation of the diaphragm 68 is required in order to lift the screen frame away from the chassis.

Thus, Hukki lacks at least one expandable element mountable in the chassis to be between said first and second bearing surfaces and expandable in a direction transverse to said bearing surfaces to effect said clamping of the screen frame. Claim 1 is therefore novel over this document.

The Examiner has suggested that the skilled person would starting from the pneumatic tube device shown in Huber, seek to combine this with the actuator and hook arrangement shown in Hukki. However, since Huber and Hukki operate in very different ways. Applicant believes that, even if the skilled person were to try to combined these documents, they would not arrive at the present invention.

Firstly, the skilled person would lack motivation to combine the documents. The device of Huber allows removal of the screen frame when the pneumatic tube is not inflated. Although the screen frame cannot be removed in a transverse direction, since the screen has a square shape, it can be removed by sliding it out. Although Hukki offers an alternative arrangement that allows removal of the screen frame in a transverse direction, the skilled person would not recognize that this provides any specific benefit to the device of Huber. They would therefore have no motivation to combine the device of Huber with any teaching of Hukki.

More importantly, even if the skilled person were to try to combine the two documents, they would be unable to do so. As explained above, the pneumatic tube 42 shown in

Huber acts to provide a clamping force in a direction transverse to parallel to the bearing surfaces. The skilled person looking to Hukki would note that the inflatable body including diaphragm 68 provides a force in a direction parallel to the bearing surfaces, so as to engage the lever 54 and thereby provide a clamping force indirectly. Essentially, this relies on a mechanical force provided through the hook 56, in contrast with the pneumatic arrangement of Huber. Hukki therefore teaches away from an expandable element, expandable in a direction transverse to the bearing surfaces.

In other words, the teachings of Hukki are incompatible with the device shown in Huber, since Huber uses a pneumatic tube to provide a clamping force directly, whereas Hukki uses the inflatable body as an actuator that acts indirectly to clamp the screen. The skilled person would simply not be able to combine the pneumatic tube of Huber with the inflatable body of Hukki to arrive at any workable device.

Rather, claim 1 of the present application comprises an expandable element that expands in a direction transverse to the bearing surfaces, so as to provide the clamping pressure that effects clamping of the screen frame. In conjunction, at least one clamping member is provided, which is not intended to provide the clamping pressure, but only to provide the second bearing surface.

This combination is not taught in any of the prior art documents, and advantageously allows the screen frame to be lifted away from the first bearing surface for removal from the chassis, simply by moving the one or more clamping members to their non-deployed position(s). None of the prior art allows such simple removal of the screen frame. Moreover, the present invention is especially suited for clamping circular screens, since these cannot be removed by sliding the screen out, as shown in Huber. Claim 1 would therefore not be obvious on the basis of the cited documents.

It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue, or comment, including the Office Action's characterizations of the art, does not signify agreement with or concession of that rejection, issue, or comment. In addition, because the arguments made above may not be exhaustive, there may

be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper. Applicant reserves the right to prosecute the rejection claims in further prosecution of this or related applications.

It is believed that the present application is in condition for allowance. Reconsideration and favorable action are respectfully requested.

The Director is authorized to charge any fee deficiency required by this paper or credit any overpayment to Deposit Account No. 23-1123.

Respectfully submitted,

WESTMAN, CHAMPLIN & KELLY, P.A.

By: /Judson K. Champlin/  
Judson K. Champlin, Reg. No. 34,797  
900 Second Avenue South, Suite 1400  
Minneapolis, Minnesota 55402-3319  
Phone: (612) 334-3222 Fax: (612) 334-3312

JKC:lrs